

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Michelle Jacobson,

Civ. No. 18-cv-02528 (SRN/HB)

Plaintiff,

vs.

DEFENDANT CHISAGO COUNTY'S
WITNESS LIST

County of Chisago and Richard Duncan,
both individually and in his official
capacity as Sheriff of County of
Chisago,

Defendants.

Defendant Chisago County submits the following list of witnesses it intends to call
at trial:

NAMES AND ADDRESSES OF WITNESSES	DESCRIPTION OF EXPECTED TESTIMONY
Plaintiff Michelle Jacobson ¹	The claims identified in her Complaint, and the damages she claims to have sustained.
Defendant Richard Duncan 7691 Wyoming Trail Chisago City, MN 50513	His interactions with Plaintiff Jacobson.
Renee Kirchner 22208 Jason Avenue N Forest Lake, MN 55025 Former Human Resource Director, Chisago County	Information when she first learned of Plaintiff Jacobson's reports of Defendant Duncan's conduct and the follow up to same.

¹ Address withheld at Plaintiff's request.

Justin Wood, Chief Deputy Chisago County Sheriff's Office 15230 Per Road Center City, MN 55012	Information regarding when he first learned of Plaintiff Jacobson's reports of Defendant Duncan's conduct and the follow up to same.
Tracy Armistead 2951 124 th Circle NE Blaine, MN 55449 Former Captain, Chisago County Sheriff's Office	Information regarding when she first learned of Plaintiff Jacobson's reports of Defendant Duncan's conduct and the follow up to same.

Defendant Chisago County reserves the right to amend and/or supplement this Witness List. Defendant Chisago County reserves the right to call any and all witnesses identified by Plaintiff and Defendant Duncan. Defendant Chisago County reserves the right to call witnesses necessary for impeachment or rebuttal.

QUINLIVAN & HUGHES, P.A.

Dated: November 3, 2021

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